

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE:

LAPEER INDUSTRIES, INC

Case No. 20-48744
Chapter 11 proceeding

Debtor.

Judge: Maria L. Oxholm

NOTICE OF AUCTION AND SALE

PLEASE TAKE NOTICE that, on January --, 2021, the Debtor filed its motion ("Sale Motion") for entry of orders pursuant to §§ 105(a), 363 and 365 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* ("Bankruptcy Code") and Rules 2002, 6004, 6006 and 9014 of the Federal Rules of Bankruptcy Procedure ("Bankruptcy Rules"): (a) approving the Bidding Procedures (as defined below) in connection with the sale ("Sale") of substantially all of Debtor's assets used or useful in their businesses as more particularly described in the Asset Purchase Agreement ("Assets"); (b) authorizing and scheduling an auction if multiple bids are received ("Auction"), in connection with the Sale; (c) approving cure procedures relating to the assumption and assignment of certain executory contracts and unexpired leases ("Assumed and Assigned Agreements") in connection with the Sale; (d) approving the form and manner of notices; (e) setting a hearing ("Sale Hearing") to take place after the Auction (if an Auction is necessary), to approve the Sale and the assumption and assignment of the Assumed and Assigned Agreements.

By Order dated _____, the Bankruptcy Court entered an order ("Bidding Procedures Order") approving certain Bidding Procedures in connection with and furtherance of the Sale Motion (the "Bidding Procedures").

Copies of the Bidding Procedures Order and the Bidding Procedures are available free of charge and may be requested by contacting Debtor's counsel at (810) 579-3600 or ztucker@winegarden-law.com.

Any party that wishes to take part in the process and submit a bid for the Assets (or the Additional Assets) must comply with all of the Bidding Procedures.

In the event the Debtor receives a Qualified Bid, the Debtor will, unless otherwise ordered by the Court, conduct the Auction with respect to the Assets. The Auction will be conducted at the offices of Winegarden, Haley, Lindholm, Tucker, and Himelhoch, PLC or such other place as may be designated by the Debtor, on February 2, 2021, commencing at 3:00 pm prevailing Eastern Time ("Auction"). Qualified Bidders may

attend the Auction via remote video connection, provided that they contact the attorney for the Debtor by email to ztucker@winegarden-law.com at least seven (7) days prior to the auction to make arrangements for a remote appearance. Qualified Bidders appearing remotely will need to provide visual verification of their identities prior to being allowed to participate.

If you seek to object to the sale of the Assets or any portion thereof, you must comply with the terms for making such objections as set forth in the Bidding Procedures Order and the Bidding Procedures.

Such objections must be filed with the Bankruptcy Court, and served on Debtor's counsel so as to be received, on or before **February 4, 2021 at 5:00 p.m.**, Eastern Time.

The Sale Hearing shall be held on February 5, 2021 at _____.m. (Eastern) and shall be held by telephone before the Honorable Maria L. Oxholm, (in accordance with her published practices), at which time the Court will hear any such objections.

If any party fails to timely file and serve an objection in accordance with the Bidding Procedures Order, the Bankruptcy Court may disregard such objection. The failure of any person to timely file its objection shall be a bar to the assertion, at the Sale Hearing or thereafter, of any objection to the Sale or the Debtor's assumption and assignment of the Assumed and Assigned agreements or the consummation of the Sale.